

Message

From: Famble, Alayna [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=2DFBAE52E6EC4F4AA61DEF7C6B5AEC1A-FAMBLE, ALA]
Sent: 7/21/2021 2:46:16 PM
To: colerb@dhec.sc.gov
Subject: FW: Updates - Items 1 - re: Bramlette MGP Site - As Pertains to the LC & Reedy River Site Investigation - Provided 210720
Attachments: ShareFile-210721-PAHsinRRCorridor-Updated 210325.pptx.pdf; ShareFile-BramletteMGP&PAHsinRRCorridor-210721.pptx.pdf; LCS-PAH-ComparisonTo-DukeBramlette-210601.pptx.pdf

I think this email should be forwarded to the Bramlette VCC contact. I think they are still in the process of developing the RI.

Alayna Famble

RPM | AL & SC SAM
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From: Dave Hargett [Ex. 6 Personal Privacy (PP)]
Sent: Tuesday, July 20, 2021 6:21 PM
To: Famble, Alayna <famble.alayna@epa.gov>
Subject: Updates - Items 1 - re: Bramlette MGP Site - As Pertains to the LC & Reedy River Site Investigation - Provided 210720

Hi Alayna

I'm providing more than you will want to digest, but a quick skim will give you context for our conversation on Friday.

Points:

1. It is all about "connecting the dots."
2. None of the contamination in LC came from LC's immediate surroundings.
3. It all came down the Reedy River.
4. The source(s) were all upstream.
5. Because PAHs are the predominant risk driver, connecting those dots takes us to the two MGPs upstream.
6. Bramlette is clearly the overwhelming source of PAHs.
7. LC, and the Reedy River, are simply "OUs" of the actual key source area, Bramlette, although there are others..

Talk to you Friday.

Dave

Bramlette Background

The following provides the SCDHEC information on the Bramlette MGP Site.....

all of this, and the links to each of the numerous technical reports can be accessed at:

<https://scdhec.gov/environment/ongoing-projects-updates/csxt-bramlett-road-site-aka-duke-power-manufactured-gas-plant>

CSXT Bramlett Road Site (aka Duke Power Manufactured Gas Plant)

Overview

The CSXT Bramlett Road Site (Site) consists of five parcels in Greenville, South Carolina, including the former location of a Duke Power Manufactured Gas Plant (MGP), which covers 3.69 acres and is located at 400 South Bramlett Road, and a seven-acre unpermitted construction and demolition debris landfill (a/k/a Vaughn Landfill) downgradient of the former MGP property. The current owner of the landfill, the MGP, and other three parcels is CSX Transportation, Inc. (CSXT).

In 1917, Southern Public Utilities originally developed the manufactured gas plant. Ownership of the MGP transferred to Duke Power Company in 1939. The plant ceased operation in 1951 and the above-ground structures were demolished in the late 1950s. In 1997, Duke Power Company changed its name to Duke Energy Corporation, in September 2006, converted to Duke Power Company, LLC, and in October of 2006, changed its name to Duke Energy Carolinas, LLC. (hereinafter generally referred to as "Duke")

Manufactured gas was the predecessor to natural gas and was used to provide gas for lighting, heating, and cooking for the City of Greenville. The Duke Power MGP produced gas using the coal gasification process. This process resulted in the creation of a tar-like waste material that was often discharged to nearby ditches or surface water bodies. Coal tar waste from the Duke Power MGP was discharged into several ditches and eventually migrated across Bramlett Road to a property where, in 1988, an unpermitted landfill was located on the property 800 feet west of the intersection of Bramlett Road and West Washington Street, on the south side of Bramlett Road. The landfill is approximately six feet in depth and covers approximately seven acres. Waste from the MGP is present beneath the landfill.

Assessments

Duke conducted several investigations to assess the nature and extent of contamination at the Site. In 2002, Duke removed 61,000 tons of material from the former MGP property and replaced it with clean soil. Soil was excavated to a depth of three to six feet across the majority of the former MGP property.

Voluntary Cleanup Contract

On July 29, 2016, Duke Energy Carolinas, LLC (Duke) entered into Voluntary Cleanup Contract 16-5857-RP (VCC) with DHEC. Under the VCC, Duke will conduct an environment investigation of the Site and will evaluate alternatives for addressing the remaining contamination. The Groundwater Remedial Investigation began in 2017. Following that initial investigation, it was determined that additional investigation was needed. In 2018, an Addendum to the Groundwater Remedial Investigation was approved and completed. Data from the Addendum showed that a third phase of Groundwater Remedial Investigation was necessary. An additional Remedial Investigation Work Plan Addendum was submitted and approved by DHEC in July 2019. This work will continue into 2020. Once completed, the Department will determine if additional work is necessary to complete the Groundwater Remedial Investigation or if data is sufficient to evaluate alternatives for addressing contamination at the site.

Historical Documents

Below are historical documents relating to the previous investigations of the Site. These documents include work plans, investigation activities, remedial action plans, and other key documents. If you are interested in documents that appear on the Index but are not listed below, please contact the Department.

Date	Docket #	Description
2021-04-15		DHEC's Approval of Quarterly Progress Report 1st Quarter 2021
2021-04-14		Quarterly Progress Report 1st Quarter 2021
2021-03-30		DHEC Approval of Interim Surface Water Best Management Practice Work Plan
2021-03-26		Interim Surface Water Best Management Practice Work Plan
2021-03		Mountain View Baptist Church Area Soil Sampling Fact Sheet
2021-01-20		DHEC's Approval of Quarterly Progress Report 4th Quarter 2020
2021-01-19		Quarterly Progress Report 4th Quarter 2020
2021-01-12		DHEC's Approval of Forensics Analysis
2020-12-28		Forensics Analysis of NAPL, Sediment, and Soil from the Former Bramlette MGP Site and Surrounding Areas
2020-11-17		DHEC's Approval of Aquifer Performance Test Work Plan
2020-11-02		DHEC's Monitoring Well Approval
2020-10-26		Aquifer Performance Test Work Plan
2020-10-26		Quarterly Progress Report 3rd Quarter 2020
2020-09-01		DHEC's approval of the Remedial Investigation Report
2020-09-01		DHEC's approval of the Remedial Investigation Work Plan Addendum (Storm Water Ditch Assessment)

2020-08-27		Duke's Remedial Investigation Work Plan Addendum - Storm Water Ditch Assessment
2020-07-22		DHEC's Review of Quarterly Progress Report 2nd Quarter 2020
2020-07-22		Quarterly Progress Report 2nd Quarter 2020
		Remedial Investigation Report <i>Because this document is so large, it had to be divided into zipped folders. Please download ALL parts before attempting to unzip.</i>
2020-06-09		<ul style="list-style-type: none"> • Part 1 • Part 2 • Part 3 • Part 4 • Part 5 • Part 6
2020-04-09	75	DHEC's Review of Quarterly Progress Report 1st Quarter 2020
2020-04-09	74	Quarterly Progress Report 1st Quarter 2020
2020-01-31	71	DHEC's Review of Quarterly Progress Report 4th Quarter 2019
2020-01-15	69A	Quarterly Progress Report 4th Quarter 2019
2019-10-23	62	DHEC's Review of Quarterly Progress Report 3rd Quarter 2019
2019-10-15	61	Quarterly Progress Report 3rd Quarter 2019
2019-08-06	60	DHEC's Review of Remedial Investigation Work Plan Addendum
2019-07-23	59	DHEC's Review of Quarterly Progress Report 2nd Quarter 2019
2019-07-15	58	Quarterly Progress Report 2nd Quarter 2019
2019-07-07	58A	Remedial Investigation Work Plan Addendum Monitoring Well
2019-07-03	57A	Remedial Investigation Work Plan Addendum
2019-04-24	56	DHEC's Review of Quarterly Progress Report 1st Quarter 2019
2019-04-15	54	Quarterly Progress Report 1st Quarter 2019
2019-01-15	51	Quarterly Progress Report 4th Quarter 2018
2018-04-13	37	Groundwater Remedial Investigation Work Plan Addendum
2017-02-20	24A	Groundwater Monitoring Report November 2016
2016-11-14	22	Groundwater Remedial Investigation Work Plan
2016-09-19	20	Notice of Community Meeting 10-4-16
2016-08-01	17	Executed VCC 16-5857-RP

2010-06-10	14	Groundwater Monitoring Report
2010-03-04	A31	Corrective Action Plan
2009-01-16	A28	Groundwater Continuous Action Plan
2003-06-09	A14	Remedial Action Plan Final Report—Volume 2
2003-06-09	A13	Remedial Action Plan Final Report—Volume 1
2000-09-14	A9	Remedial Action Plan
2000-06-30	A8	Investigation & Site Assessment Report—Phase III, Volume 2
2000-06-30	A7	Investigation & Site Assessment Report—Phase III, Volume 1
1997-03-21	A5	Workplan—Phase III
1996-09-03	A4	Site Investigation—Phase II
1996-08-17	A3	Site Investigation: Soil Sediment & Groundwater Sampling
1995-08-01	A2	Workplan: Site Investigation and Monitoring Well Installations
1994-10-01	A1	Workplan: Soil Sediment & Groundwater Sampling

Dave Hargett, Ph.D.

Ex. 6 Personal Privacy (PP)